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*Counsel for Movants and Proposed Liaison Counsel*

[Additional counsel listed on signature page]

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

SCOTT STERLING, individually and  
on behalf of all others similarly  
situated,

Plaintiff,

vs.

IRIS ENERGY LIMITED, DANIEL  
ROBERTS, WILLIAM ROBERTS,  
BELINDA NUCIFORA, DAVID  
BARTHOLOMEW, CHRISTOPHER  
GUZOWSKI, and MICHAEL  
ALFRED,

Defendants.

Case No. 2:22-cv-7273-JMV-MAH

Honorable John Michael Vazquez

Class Action

**MOTION DAY: March 20, 2023**

**ORAL ARGUMENT REQUESTED**

**Motion of Network Racing Pty Ltd., Nahi Beaini, LRJ  
Superannuation Fund, and De Stoop Investments  
Pty Ltd. for Appointment of Lead Plaintiff and  
for Approval of Selection of Lead Counsel**

PLEASE TAKE NOTICE that, under Section 27(a)(3)(B) of the Securities Act of 1933, 15 U.S.C § 77z-1(a)(3)(B), and Section 21D(a)(3)(B) of the Securities and Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995, movants Network Racing Pty Ltd., Nahi Beaini, LRJ Superannuation Fund, and De Stoop Investments Pty Ltd. (together the “IREN Investor Group”) will move, on March 20, 2023, or as soon thereafter as the matter may be heard before the Honorable John Michael Vazquez, in Courtroom PO 03 of the Martin Luther King Building & United States Courthouse, 50 Walnut Street, Newark, New Jersey 07102, for entry of an order:

- (1) appointing the IREN Investor Group as a group or in the alternative, any of the group members individually as lead plaintiff in this action;
- (2) approving the group’s selection of Bottini & Bottini, Inc. as lead counsel, and Cohn Lifland Pearlman Herrmann & Knopf LLP as liaison counsel; and

(3) granting such other and further relief as the Court deems just and proper.

In support of this motion, the IREN Investor Group submits the accompanying memorandum of law and the Declaration of Albert Y. Chang (with Exhibits 1 through 6), and a [Proposed] Order, and relies on all papers and proceedings in this action.

Dated: February 13, 2023

Respectfully submitted,

COHN LIFLAND PEARLMAN

HERRMANN & KNOPF LLP

Peter S. Pearlman

Matthew F. Gately

s/ Peter S. Pearlman

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*Investments Pty Ltd. and Proposed*

*Liaison Counsel*

BOTTINI & BOTTINI, INC.

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